



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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March 18, 2008

Robert Buckingham
Neenah Community Development Authority
PO Box 426
Neenah WI 54957

SUBJECT: General Liability Clarification Letter for Hazardous Substances and Solid Waste on the
P H Glatfelter Co (former) Properties
225 West Wisconsin Avenue (generally), Neenah, Wisconsin
WDNR BRRTS #: 07-71-550924
(including 02-71-550733, 02-71-550734 and 02-71-550735)

Dear Mr. Buckingham:

Request

On February 11, 2008, the Department of Natural Resources (Department), received a request for a general liability clarification letter from William P. Scott of Gonzales, Saggio, Harlan on behalf of the City of Neenah (Neenah) and the Community Development Authority of the City of Neenah (CDA). The \$500 fee for assistance was received on February 11, 2008 in accordance with ch. NR 749, Wis. Adm. Code.

This letter provides the Department's liability determinations under the state's Spill and Solid Waste laws with respect to Neenah and the CDA with acquisition of the Properties for the purpose of slum clearance or blight elimination; general explanation of the Bona Fide Prospective Purchaser (BFPP) defense; and the applicability of the Department's joint "One Cleanup Program" with the US Environmental Protection Agency (EPA).

The Properties are located at 201, 207, 225 (A & B) and 232 West Wisconsin Avenue and 235 Main Street, also known as the P H Glatfelter Co properties (collectively referred to in this letter as the "Properties"), encompassing a total of 7.287 acres. The Properties are located in the SW1/4, SW1/4, Section 22, T20N, R17E, Winnebago County, Wisconsin. They are legally described as listed in Attachment A to this letter.

Sections 292.11(9)(e)1m, Stats., and 292.23(2), Stats., were created to exempt LGUs from liabilities for hazardous substance discharges that the LGU did not cause, and unlicensed, historic, solid waste deposits on a property, respectively. These exemptions apply if the property is acquired by a LGU through various means specified in the statutes, including but not limited to tax delinquency, bankruptcy, eminent domain, condemnation, or for the purpose of slum clearance or blight elimination.

An LGU that performs due diligence and documentation in accordance with federal All Appropriate Inquiry (AAI) and BFPF standards, before acquiring a property, may also be protected from the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, also known as Superfund) liability, and may be eligible for a third party defense against potential lawsuits. As a federal liability protection, future decisions concerning CERCLA liability would ultimately be made by the EPA or in court if questions were to arise.

Background and Documents Reviewed

Summaries of background data concerning the Properties and of the documents reviewed to make these liability determinations can be found in Attachments B and C, respectively.

Liability Determinations

The CDA has notified the Department of the discharges of hazardous substances that are known to have occurred on the Properties. They have also provided the exhibits and documents listed in Attachment C to this letter. Based upon the information available to date, the Department provides the following environmental clarifications and assurances to Neenah and the CDA concerning their proposed method of acquiring the Properties and the intended redevelopment plans.

1. Do Neenah and the CDA qualify as LGUs for the Property under s. 292.11(9)(e), Wis. Stats.?

Yes. The definition of a "local governmental unit" in s. 292.11(9)(e)(1), Stats., is "a municipality, a redevelopment authority created under s. 66.1333, a public body designated by a municipality under s. 66.1337(4), a community development authority or a housing authority". Neenah and its CDA each would qualify as a LGU for the Properties.

The CDA was created by the City of Neenah on April 20, 2004, by Ordinance No. 1257, to replace the Neenah Housing Authority. The CDA operates, in conjunction with the city council, under the provisions of s. 66.1335, Stats., and other applicable statutes on a case-by-case basis, to acquire and redevelop properties for the purpose of slum clearance and blight elimination. The CDA is not a tax exempt, non-profit organization under section 501(a), Internal Revenue Code, and is not considered to be an economic development corporation under s. 292.11(9)(e)1s, Stats., or Neenah Ordinance No. 1257.

2. Does the CDA's process for the acquisition of the Glatfelter Properties qualify for the LGU Liability Exemptions in accordance with s. 292.11(9)(e)1m, and 292.23(2), Wis. Stats.?

In order to qualify for the LGU liability and solid waste exemptions, the LGU must acquire the Properties through one of the methods listed in s. 292.11(9)(e)1m, Stats., and s. 292.23(2), Stats., respectively.

Sections 292.11(9)(e)1m.d., and 292.23(2)(d), Stats., state that an LGU qualifies for the liability and solid waste exemptions, respectively, if "the local government acquired the properties for the purpose of slum clearance or blight elimination." This is the acquisition method and purpose being pursued by the CDA.

Sections 66.1331, 66.1333, and 66.1335, Wis. Stats., allow a city, its redevelopment authority, or its community development authority, respectively, to acquire property to eliminate blighted conditions. One of the means by which any of these LGUs could acquire property for the purpose of slum clearance or blight elimination is to negotiate the acquisition of the property from the current owner(s).

The steps the City of Neenah and its CDA have taken in accordance with these statutes are listed below, along with the Department's understanding that the statutory steps have been satisfied:

A. Comprehensive Plan: Section 66.1335, Stats., provides that the city plan commission may develop a comprehensive or general plan to serve as a guidance document for specific areas or redevelopment projects.

The Department understands that this requirement was satisfied by the adoption of the City of Neenah 2020 Comprehensive Plan by the Common Council on April 7, 1999, and other subsequent local plans.

B. Project Area Designation: The community development authority of the city must designate the boundaries of a project area and submit such boundaries to the local legislative body, which must adopt a resolution that declares such area to be a blighted area in need of redevelopment or blight elimination, slum clearance and/or urban renewal.

The Department understands that the CDA created an amended redevelopment plan, and declared the Properties blighted, in the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1* (Redevelopment Plan). The Redevelopment Plan identifies the project area as "generally bound on the east by Church Street; on the south by Smith Street, on the west by Torrey Street and extending along a line northerly to the south shore of Little Lake Butte des Morts, and on the north by the south shore of Little Lake Butte des Morts." The boundaries were approved by the CDA in the *Community Development Authority of the City of Neenah, Resolution No. 2008-1* dated February 11, 2008. The Common Council approved the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1* and boundaries on February 20, 2008 in Resolution No. 7261.

C. Public Hearing: The local legislative body or the community development authority (s. 66.1331(5)(b)(3), Stats.) must hold a public hearing concerning the redevelopment plan, and find that the redevelopment plan is feasible and in conformity with the general plan for the city.

The CDA held a public hearing on February 11, 2008 and subsequently made the necessary findings concerning the feasibility and conformity of the Redevelopment Plan in Resolution No. 2800-1, dated February 11, 2008.

D. Redevelopment Plan: The community development authority of the city (s.66.1331(5)(b)(2) or s. 66.1333(6)(b)2, Stats.) and the local legislative body must approve the redevelopment plan of the project area.

The CDA created an amended Redevelopment Plan in the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1*. Figure 4 of the amended Redevelopment Plan identifies the Properties to be potentially redeveloped as "MU – Mixed-Use Development". The amended Redevelopment Plan was approved by the CDA in the *Community Development Authority of the City of Neenah, Resolution No. 2008-1* dated February 11, 2008. The Common Council approved the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1* on February 20, 2008.

E. Adoption: The CDA approved the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1* on February 11, 2008. The Common Council approved the *Redevelopment Area No. 2 – Downtown Gateway Redevelopment Plan, Amendment #1* on February 20, 2008.

Conclusions: Based on the information provided to the Department, the Department concludes that the City of Neenah and its CDA have taken the necessary steps under sections 66.1331, 66.1333, and 66.1335, Stats, to acquire the Properties for the purpose of slum clearance or blight elimination, and that the CDA will meet the property acquisition conditions of s. 292.11(9)(e)1m, Stats., upon final acquisition of the Properties.

The City of Neenah and the Department have checked available landfill licensing records to determine whether a licensed landfill was ever operated on the Properties. Based on the uncertain origins of the ash and foundry sand deposits identified, and the absence of any clear license information for the SW1/4, SW1/4, Section 22, T20N, R17E, Winnebago County, Wisconsin, the Department determines that the CDA also qualifies for the LGU solid waste exemption under s. 292.23, Stats. This exemption is applicable only if all the other provisions of s. 292.23, Stats are followed by the CDA. We recommend that you talk with the Department before taking any actions on the property, so that your actions can be made consistent with known environmental hazards and threats on the Properties.

The CDA is negotiating an offer to purchase the Properties from P H Glatfelter Co and anticipates the agreement will be finalized by March 30, 2008. The intent is to schedule a closing date upon completion of the agreement, and after the completion of remaining AAI and BFPP investigations of the Properties.

The Department determines that the CDA will have completed acquisition of the Properties in accordance with s. 292.11(9)(e)1m, Stats., and s. 292.23(2)(d), Stats., upon taking title for the Properties through the proposed course of action. This will make the CDA eligible for both the LGU exemption and the LGU solid waste exemption upon completion of the acquisition process. Please notify the Department as soon as the CDA takes title to the Properties.

3. Will the CDA obtain the Bona Fide Prospective Purchaser Defense against liability under CERCLA s. 107(a)(1) with respect to the Property if, prior to acquiring the Property but not more than 180 days prior, the CDA completes a Phase I Environmental Site Assessment meeting the requirements of ASTM Standard E-1527-05?

It is our understanding that the CDA believes that it will meet the requirements of AAI and BFPP.

As you know, the Brownfields Amendments added the bona fide prospective purchaser provision at CERCLA Section 107(r). The provision provides protection from CERCLA liability (including a third-party defense), and limits EPA's recourse for unrecovered response costs to a lien on property for the increase in fair market value attributable to EPA's response action. To meet the statutory requirements for a bona fide prospective purchaser, a person must meet the requirements set forth in CERCLA Section 101(40).

A bona fide prospective purchaser must have bought property after January 11, 2002 (the date of enactment of the Brownfields Amendments). A bona fide prospective purchaser may purchase property with knowledge of contamination after performing all appropriate inquiries (40 CFR Part 312) into ownership and uses of the property, provided the property owner meets or complies with all of the other statutory requirements set forth in CERCLA Section 101(40). Conducting all appropriate inquiries alone does not provide a landowner with protection against CERCLA liability.

Landowners who want to qualify as bona fide prospective purchasers must comply with all of the statutory requirements. The statutory requirements include, but are not limited to, that the landowner must:

- have acquired a property *after* all disposal activities involving hazardous substances at the property;
- provide all legally required notices with respect to the discovery or release of any hazardous substances at the property;
- exercise appropriate care by taking reasonable steps to stop continuing releases, prevent any threatened future release, and prevent or limit human, environmental, or natural resources exposure to any previously released hazardous substance;
- provide full cooperation, assistance, and access to persons that are authorized to conduct response actions or natural resource restorations;
- comply with land use restrictions established or relied on in connection with a response action;
- not impede the effectiveness or integrity of any institutional controls;
- comply with any CERCLA request for information or administrative subpoena; and
- not be potentially liable, or affiliated with any other person who is potentially liable, for response costs for addressing releases at the property.

Persons claiming to be bona fide prospective purchasers should keep in mind that failure to identify an environmental condition or identify a release or threatened release of a hazardous substance on, at, in or to a property during the conduct of all appropriate inquiries does not relieve a landowner from complying with the other post-acquisition statutory requirements for obtaining the liability protections. Landowners must comply with all the statutory requirements to obtain the liability protection. For example, an inability to identify a release or threatened release during the conduct of all appropriate inquiries does not negate the landowner's responsibilities under the statute to take reasonable steps to stop a release, prevent a threatened release, and prevent exposure to a release or threatened release. None of the other statutory requirements for the bona fide prospective purchaser liability protection are contingent upon the results of the conduct of all appropriate inquiries.

The Department understands that the CDA (not the City) plans to complete, and pay for, all appropriate inquiries at the Properties before acquiring the Properties (including performing Phase I ESAs meeting ASTM Standard E-1527-05 for 232 West Wisconsin Avenue and 235 Main Street and updating the Phase I ESA for 225A & B, 201 and 207 West Wisconsin Avenue). A written report documenting the findings of the AAI investigation will be prepared and submitted to the Department by the CDA before acquiring the Properties. The CDA's letter of intent/plan for addressing continuing obligations, in accordance with CERCLA requirements, will also be provided. If the CDA completes these steps in a timely manner, the documentation provided will provide the background needed to substantiate a claim by the CDA for CERCLA liability protection, should a future need arise. This may also allow the CDA to be eligible (without CERCLA liability) to apply for federal grant money for the Properties, should the CDA choose to pursue such funding.

If the City of Neenah (not the CDA) is doing and paying for the AAI work, the CDA will need to say that they reviewed and relied on the AAI work prior to making the final acquisition decision. The CDA, under these circumstances, will still need to submit a letter making the BFPP claims, as described above.

Other Specific Question from the city and CDA

4. Neenah and the CDA also want to know what assurance the Department can provide that it will proceed in accordance with the "One Cleanup" program, such that neither Neenah nor the CDA will be held liable under either the state's Spill Law, the state's Hazardous Waste Management Laws and the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), Toxic Substances Control Act (TSCA) and Leaking Underground Storage Tanks (LUST), all with respect to pre-acquisition conditions at the Property.

In November 2006, the Wisconsin Department of Natural Resources (Department) entered into a One Cleanup Program (OCP) Memorandum of Agreement (MOA) with U.S. EPA - Region 5. The primary purpose of the OCP MOA was to document that Wisconsin's consolidated approach to cleaning up contaminated areas under the NR 700 series is consistent with EPA's federal cleanup programs. In general, the OCP MOA indicates that U.S. EPA - Region 5 does not plan or anticipate taking action at sites cleaned up under the jurisdiction of the Department and in accordance with the provisions of the NR 700 series. A complete copy of the OCP MOA is available at:
<http://www.dnr.state.wi.us/org/aw/rr/cleanup/ocp.htm>

Sites with PCB contamination subject to TSCA are described in Attachment 1 to the OCP MOA. EPA Region 5 and the WDNR have agreed to implement the review process in this attachment, which clarifies the roles and responsibilities of each agency at certain sites involving PCB contamination.

This letter provides the needed assurances and environmental clarifications concerning the LGU liability exemptions for the CDA with regards to the Properties. We hope it helps Neenah and the CDA move forward on this important redevelopment project.

Should you have questions regarding technical aspects of the Properties, please contact Jennifer Borski at (920) 424-7887. If you have liability questions concerning this letter, please contact Dan Kolberg at (608) 267-7500. Best wishes for your successful brownfields redevelopment efforts. Let us know if we can be of further assistance.

Sincerely,



Bruce G. Urben
NER Remediation and Redevelopment Team Supervisor

Encl: Attachment A: Glatfelter Properties Proposed for Acquisition, 2/29/2008
Attachment B: Background Data Concerning the Properties
Attachment C: List of Exhibits Provided and Documents Reviewed

cc: James Godlewski – City of Neenah
William P. Scott, Gonzalez Saggio & Harlan, LLP
A H Skip Glor – Northern Environmental
Jennifer Borski – DNR, Oshkosh
Dan Kolberg – DNR, Madison-RR
Mark Gordon – DNR, Madison-RR
Annette Weissbach – DNR, Green Bay
Joe Renville – DNR, Madison-LS

ATTACHMENT A

Glatfelter Properties Proposed for Acquisition 02/29/2008

PARCEL #	ADDRESS	ACREAGE	LAND SQ. FT.	LEGAL DESCRIPTION
10-0405-00-00	201 W. Wisconsin Ave.	0.175	7,618	Warners Addition Lot 1, 2 & 3 Excepting that portion of Lot 1 described as follows: Beginning at the SE corner of Lot 1, Blk B, Warners Addition to Neenah; Thence, Northerly along the W line of Church St. 45 ft; Thence SW 49.2 ft to a point on the N line of Wisconsin Ave. located 20 ft NW of the SE corner of Lot 1; Thence SE along the N line of Wisconsin Ave. 20 ft to the POB.
10-0408-00-00	207 W. Wisconsin Ave.	0.062	2,688	Warners Addition Lot 4 Blk B
10-0409-00-00	225A W. Wisconsin Ave.	0.525	22,848	Warners Addition Lots 5 – 12 & E ½ Lot 13 Blk B
10-0417-00-00	225B W. Wisconsin Ave.	5.993	261,055	Part of Lots 1 – 16, Blk 1, Plat of North Neenah, pt of lots 5-9, Blk 2, per Palmer's Map of Neenah of 1874, lots 14 & 15, Blk B, all of Blk C, and pt of vacated Main St., Canal St. and Alley, in Warner's Addition to Neenah
10-0431-00-00	235 Main St.	0.303	13,199	Plat of North Neenah W1/2 of Lot 18, all of Lot 19, 20 & 21 Blk 1 Exc Doc.# 1093501 For Overpass
10-0476-00-00	232 W. Wisconsin Ave.	0.229	9,963	Jones Second Addition Lot 14, 15 & 16 Blk 3
		7.287	317,371	

Note: The properties currently addressed as 201, 207, 225 (A & B) and 232 West Wisconsin Avenue and 235 Main Street are commonly referred to as the P H Glatfelter Co properties. The local mailing address for P H Glatfelter Co is 232 West Wisconsin Avenue. "225 West Wisconsin Avenue" is the Department's general location reference for the Properties due to the environmental releases discovered at the parcel addressed as 225B West Wisconsin Avenue. This parcel comprises the bulk of the area, and is important to plans for division and redevelopment of the Properties.

ATTACHMENT B

BACKGROUND DATA CONCERNING THE PROPERTIES

The Properties are comprised of six parcels in Neenah. The largest parcel is a 5.993-acre parcel that is the former P H Glatfelter Co paper mill (225B West Wisconsin Avenue), occupied with inter-connected buildings in an L-shaped pattern with original buildings from the 1870's and subsequent additions. This property is bordered to the northwest by Canadian National Railroad, to the north by Little Lake Butte des Morts, to the northeast by Kimberly Clark Experimental Mill (128 North Commercial Street), to the southeast by Church Street, to the south by West Wisconsin Avenue and Main Street and to the southwest by Millview Drive. Also included within the described boundaries are two former retail parcels located northwest of the intersection of West Wisconsin Avenue and Church Street (201 and 207 West Wisconsin Avenue at 0.175 and 0.062 acres, respectively) and a 0.525-acre parcel (225A West Wisconsin Avenue) located west of 207 West Wisconsin Avenue that is a former machine shop. The Properties also include a 0.303-acre parcel at 235 Main Street that is a parking lot, located northwest of the intersection of Main Street and Millview Drive and the 0.229-acre parcel at 232 West Wisconsin Avenue that is the former engineering building for P H Glatfelter Co, located south of the intersection of West Wisconsin Avenue and Main Street. All parcels combined total 7.287 acres and are included in any references in this letter to the "Properties".

ENTACT Environmental Services performed a Phase I Environmental Site Assessment (ESA) of 225 (A & B), 201 and 207 West Wisconsin Avenue in August 2006 on behalf of Junction Street Capital LLC. These parcels have a history of retail and pulp and paper mill operations dating back to 1874 through June 2006. The mill is constructed over an existing canal. A dry cleaner formerly operated adjacent to Church Street from approximately 1940 to 1979. A machine shop formerly operated at 213 West Wisconsin Avenue (currently included in the legal description for 225A West Wisconsin Avenue) from approximately 1926 to 1948. The CDA is completing its own AAI and BFPP investigations of the Properties before completing final acquisition steps.

Northern Environmental performed a Phase II ESA of 225 (A & B), 201 and 207 West Wisconsin Avenue in October 2007 on behalf of the CDA. The Phase II included completion of 22 soil probes and ten monitoring wells on the parcels listed. Sampling at these locations revealed diesel range organics (DRO), arsenic, lead and volatile organic compounds (VOCs) concentrations in soil above ch. NR 720, Wis. Adm. Code standards. Polychlorinated biphenyls (PCBs) were found in soil above 1 part per million (ppm). Polycyclic aromatic hydrocarbon (PAH) concentrations were detected in soil above Department guidance levels. VOCs, arsenic and lead concentrations were found in groundwater above NR 140 enforcement standards. VOCs, total chromium and total mercury were found in groundwater above NR 140 preventive action limit standards. Other concerns include ash fill and potential foundry sand at varying depths. There is no known history of licensed solid waste disposal on the Properties that has been found by either the CDA or the Department.

Because of the soil and groundwater contamination discovered, primarily at 225B West Wisconsin Avenue, notifications of hazardous substance discharges were sent to P H Glatfelter Co on January 16, 2008 and the Department opened two remedial cases:

WDNR Site Name: **P H Glatfelter (former) – chlorinated**, WDNR BRRTS # **02-71-550733**

WDNR Site Name: **P H Glatfelter (former) – repair shop**, WDNR BRRTS # **02-71-550734**

Both cases are listed under the address of 225 West Wisconsin Avenue.

It is currently unclear if the ash fill and contamination discovered northwest of the existing buildings is from property owned by P H Glatfelter Co or Canadian National Railroad. As a result, the Department issued potentially responsible party letters to both parties on January 14, 2008 and the Department opened the remedial case:

WDNR Site Name: **P H Glatfelter (former) – ash fill, WDNR BRRTS # 02-71-550735**

This case is currently listed under the address of 225 West Wisconsin Avenue.

ATTACHMENT C

LIST of EXHIBITS PROVIDED and DOCUMENTS REVIEWED

Exhibits Provided

Exhibit 1 – Table 1: Proposed Acquisition Steps; Glatfelter Mill Redevelopment Project

Exhibit 2 – Glatfelter Mill Redevelopment Project Public Approval Timeline

Exhibit 3 – Redevelopment Area No. 2 Downtown Gateway Redevelopment Plan, Amendment #1, Neenah Community Development Authority & Neenah Common Council, dated February 2008.

Exhibit 4 – Community Development Authority of the city of Neenah, Resolution No. 2008-1, Resolution approving amended boundaries for redevelopment area no. 2 – Downtown Gateway; approving amended redevelopment plan therefore; and submitting said amended boundaries and amended redevelopment plan to the common council of the city for approval, adopted and approved February 11, 2008.

Exhibit 5 – Resolution No. 7261, Resolution designating redevelopment area no. 2 – Downtown gateway boundaries – amendment #1; declaring blight; and approving the redevelopment plan – amendment #1 therefore, adopted and approved February 20, 2008.

Exhibit 6 – Ordinance No. 1257, Introduced: April 20, 2004, an ordinance: By Finance and Personnel Comm., Re: Creating Sec. 1.42 relating to establishing a Community Development Authority; superseding Res. No. 4063; abolishing the Neenah Housing Authority and assigning the duties of the Neenah Housing Authority to the Community Development Authority, adopted and approved April 20, 2004 and published April 26, 2004.

Exhibit 7 – Downtown Gateway – Glatfelter Mill Redevelopment Project, Operating Plan, City of Neenah, Neenah Community Development Authority, February 2008.

Documents Reviewed

- September 2006 Phase I Environmental Site Assessment Report for P.H. Glatfelter Company, 225 W. Wisconsin Avenue, Neenah, Wisconsin 54956, prepared by ENTACT for Junction Street Capital, LLC.
- January 8, 2008 Phase II Environmental Site Assessment at Glatfelter Paper Mill, 225 West Wisconsin Avenue, Neenah, Wisconsin 54956, prepared by Northern Environmental for Mr. Robert Buckingham, CDA.
- Attachment A: List of Exhibits provided by the CDA on February 11, 2008 to assist the Department in making this liability determination
- February 22, 2008, 7:10 PM electronic mail from Bill Scott (Gonzalez Saggio & Harlan LLP) to Dan Kolberg (Department), titled *Neenah – signed resolution*
- February 28, 2008, 1:43 PM electronic mail from Bob Buckingham (CDA) to Jennifer Borski and Dan Kolberg (Department) and Bill Scott (Gonzalez Saggio & Harlan LLP) titled *Re: Request for additional information for GLC – CDA*

- February 28, 2008, 5:16 PM electronic mail from Bill Scott (Gonzalez Saggio & Harlan LLP) to Jennifer Borski (Department), Bob Buckingham (CDA) and Jim Godlewski (Neenah), titled *RE: More questions on Neenah CDA GLC request*
- February 28, 2008, 5:34 PM electronic mail from Bob Buckingham (CDA) to Jennifer Borski (Department) and Bill Scott (Gonzalez Saggio & Harlan LLP) titled *RE: More questions on Neenah CDA GLC request*
- February 29, 2008, 3:38 PM electronic mail from Bill Scott (Gonzalez Saggio & Harlan LLP) to Dan Kolberg, Jennifer Borski and Darsi Foss (Department), titled *Neenah, GLC letter*
- February 29, 2008, 4:17 PM electronic mail from Bob Buckingham (CDA) to Jennifer Borski and Dan Kolberg (Department), Bill Scott (Gonzalez Saggio & Harlan LLP) and Jim Godlewski (Neenah) titled *Re: Request for additional information for GLC – CDA*
- March 7, 2008, 3:54 PM electronic mail from Jennifer Borski to Dan Kolberg (Department), titled *Re: Glatfelter GLCL*
- March 11, 2008, 9:49 AM electronic mail from Jennifer Borski to Dan Kolberg (Department), titled *Re: Glatfelter GLCL*